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CHURCH OF SCIENTOLOGY  
12 INTERNATIONAL

13  
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF MARIN  
15

16	CHURCH OF SCIENTOLOGY	)	CASE NO. 157680
17	INTERNATIONAL, a California not-	)	
17	for-profit religious corporation,	)	[LASC NO. BC-052395]
18		)	
18		)	[CONSOLIDATED]
19		)	
19		)	PLAINTIFF CHURCH OF
20	Plaintiff,	)	SCIENTOLOGY INTERNATIONAL'S
20		)	MOTION TO COMPEL DEFENDANT
21	vs.	)	GERALD ARMSTRONG TO ANSWER
21		)	DEPOSITION QUESTIONS, AND
22		)	FOR SANCTIONS
22		)	
23		)	
23		)	DATE: January 27, 1995
24	GERALD ARMSTRONG; DOES 1 through	)	TIME: 2:00 p.m.
24	25, inclusive,	)	CALENDAR: Law and Motion
25		)	HEARING JUDGE: Discovery
25		)	Referee
26	Defendants.	)	
26		)	TRIAL DATE: May 18, 1995

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HUB LAW OFFICES

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1 PLEASE TAKE NOTICE that on January 27, 1995, at 2:00 p.m. or  
2 as soon thereafter as may be heard at the offices of William  
3 Benz, Esq., located at 900 Larkspur Landing Circle, No. 185,  
4 Larkspur, California, plaintiff Church of Scientology  
5 International ("Church") will appear by its attorneys Wilson,  
6 Ryan and Campilongo and Bowles and Moxon, and move this Court,  
7 pursuant to California Code of Civil Procedure Section 2025(o)  
8 for an Order compelling defendant Gerald Armstrong ("Armstrong")  
9 to answer certain questions propounded to him at his oral  
10 deposition on August 18, 19 and October 20, 1994, which Armstrong  
11 refused to answer.

12 Plaintiff moves this Court to compel answers to those  
13 certain deposition questions on the grounds that no objections  
14 interposed to such questions are proper or applicable under the  
15 facts and law.

16 This Motion is based upon this Notice of Motion and Motion,  
17 the accompanying Memorandum of Points and Authorities, the files  
18 on record in this case, the transcript of the deposition of Mr.  
19 Armstrong, and such other and further evidence as may properly  
20 come before this Court at the hearing of this matter.

21 Dated: December 22, 1994

Respectfully submitted,

MICHAEL LEE HERTZBERG

WILSON, RYAN & CAMPILONGO

24 By:

15/  
Andrew H. Wilson

Laurie J. Bartilson  
BOWLES & MOXON

26 Attorneys for Plaintiff  
27 CHURCH OF SCIENTOLOGY INTERNATIONAL  
28



PROOF OF SERVICE

STATE OF CALIFORNIA        )  
                                  )    ss.  
COUNTY OF LOS ANGELES    )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On December 22, 1994, I served the foregoing document described as PLAINTIFF CHURCH OF SCIENTOLOGY INTERNATIONAL'S MOTION TO COMPEL DEFENDANT GERALD ARMSTRONG TO ANSWER DEPOSITION QUESTIONS, AND FOR SANCTIONS on interested parties in this action,

by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

by placing  the original  true copies thereof in sealed envelopes addressed as follows:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

PAUL MORANTZ  
P.O. Box 511  
Pacific Palisades, CA 90272

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

BY MAIL

\*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of

business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on December 22, 1994 at Los Angeles, California.

[ ] \*\*(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on \_\_\_\_\_ at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[ ] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

\_\_\_\_\_  
Print or Type Name

\_\_\_\_\_  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

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